



# CITY OF GREENLEAF

20523 North Whittier Drive  
Greenleaf, Idaho 83626



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RE: REVIEW COMMENTS  
DRAFT IPDES USERS GUIDE VOLUME 6 – SEWAGE SLUDGE (BIOSOLIDS)

Greetings!

Thank you for the opportunity to review the Idaho Pollutant Discharge Elimination System (IPDES) draft User's Guide to Permitting and Compliance Volume 6 – Sewage Sludge and Biosolids. The City of Greenleaf offers the following comments and recommendations.

The City of Greenleaf is very appreciative of the intent of these guides as stated in the introduction, to "...help the regulated community and other public users easily understand the IPDES permitting and compliance process and the IPDES statutory and regulatory requirements...". This is of paramount importance to Idaho, and particularly to municipal publicly owned treatment works (POTWs).

It is important to note that over half of the approximately 200 cities in the State of Idaho have populations less than 1,500 people, providing services under an economy of scale which requires that the small-town public works staff multi-task across multiple disciplines to effectively and efficiently operate and maintain not only the POTW, but also potable water, irrigation water, and roads & streets. In the specific case of the City of Greenleaf, our two-person public works staff works diligently to perform all these functions on a day-to-day basis, with supervisory assistance from a contract wastewater operator of record for POTW operation.

It is also notable that small-town government, while typically the most grass-roots, trusted, and in-touch at the local level, is also subject to the downside of small-town politics. Transitions may not be smooth, and can be rough, sudden, and deep. For example, in 2004 the City of Greenleaf experienced a mayoral recall election in which all city employees except the utility billing clerk and irrigation system ditch rider resigned before the election, and the election resulted in loss of Mayor and resignation of two City Council Members. This left no quorum for the City Council, and the city had to wait for the Governor to appoint a 3<sup>rd</sup> Council Member so that city government could re-build with

*RE: Draft IPDES Users Guide Vol. 6 – Sewage Sludge (Biosolids), p. 1 of 2*

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appointments of a 4<sup>th</sup> Council Member, Mayor, Clerk, Treasurer, Attorney, and begin hiring process for public works personnel.

Guidance must be written so that it is understandable by the lay person. Small-town public works employees often gain their expertise in wastewater through on-the-job experience. Additionally, small-town public works employees typically perform their work with direction straight from Mayor and/or City Council that do not have a background in wastewater treatment. The need is great for both simplicity and visual tools to aid in the understanding of requirements.

*The City of Greenleaf recommends the addition of two new appendices to the draft. One additional appendix to contain a flowchart or flowcharts to visually represent the requirements and decision-making process for successful fulfillment of requirements, and the other additional appendix to contain a checklist or checklists to help ensure that required actions are not missed. Incorporation of recommended timelines and required deadlines to both flowcharts and checklists would also be very helpful.*

The processes described in the user guide are dependent upon the successful navigation and usage of the E-Permitting System. Frankly, the E-Permitting System can be very challenging, complex, and non-intuitive in its current iteration. The city understands that the system is not currently what DEQ wants it to be, and appreciates DEQs continuing efforts to streamline and make the E-Permitting System more user-friendly in its' operation.

Respectfully submitted,

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City of Greenleaf